

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: BARRY PORTNOY	CASE No. 14-16081-mdc Chapter 7
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STIPULATION EXTENDING TIME TO RESPOND

Movants Republic First Bank d/b/a Republic Bank (“**Movant**”) and the Respondents (i) Danielle Portnoy, (ii) Samantha Portnoy, (iii) Zachary Portnoy, (iv) Altchem Environmental Services, Inc., (v) Samzach Partners, L.P., (vi) Sam-Zachary Partners, LLC, (vii) BF Services, L.P., (viii) Maxis Construction Group (incorrectly sued herein as Maxsys, Inc.), (ix) Danielle Portnoy as co-trustee of the Revocable Deed of Trust of Danielle M. Portnoy, (x) Samantha Portnoy as co-trustee of the Revocable Deed of Trust of Danielle M. Portnoy, (xi) Danielle Portnoy as custodian for Zachary Portnoy and Samantha Portnoy, and (xii) Danielle Portnoy as Trustee of the SamZach Irrevocable Trust (“**Respondents**”), by and through their counsel, hereby Stipulate and Agree that the Respondents have an extension of time from February 15, 2017 to **February 17, 2017** to file any Opposition or Response to Movant’s pending “Motion of Republic First Bank to Strike Alleged Liens” (the hearing date of which is scheduled for March 7, 2017).

IT IS SO STIPULATED AND AGREED.

DATED: February 13, 2017 CLARK HILL PLC BY: <u>/s/ Jonathan W. Hugg</u> Jonathan W. Hugg Clark Hill PLC Attorneys for Movant Republic First Bank	DATED: February 13, 2017 BOCHETTO & LENTZ, P.C. BY: <u>/s/ Albert M. Belmont, III</u> George Bochetto Albert M. Belmont, III Attorneys for Respondents (i) Danielle
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d/b/a Republic Bank	Portnoy, (ii) Samantha Portnoy, (iii) Zachary Portnoy, (iv) Altchem Environmental Services, Inc., (v) Samzach Partners, L.P., (vi) Sam-Zachary Partners, LLC, (vii) BF Services, L.P., (viii) Maxis Construction Group (incorrectly sued herein as Maxsys, Inc.), (ix) Danielle Portnoy as co-trustee of the Revocable Deed of Trust of Danielle M. Portnoy, (x) Samantha Portnoy as co-trustee of the Revocable Deed of Trust of Danielle M. Portnoy, (xi) Danielle Portnoy as custodian for Zachary Portnoy and Samantha Portnoy, and (xii) Danielle Portnoy as Trustee of the SamZach Irrevocable Trust
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IT IS SO ORDERED.

BY THE COURT:

Dated:

MAGDELINE D. COLEMAN
UNITED STATES BANKRUPTCY JUDGE